



A03-0024 07/13/01

National Environmental Achievement Track

Application Form

U.S. Steel Clairton Works

Name of facility

USX Corporation

Name of parent company (if any)

400 State Street

Street address

street address

Street address (continued)

Clairton, PA 15025

City/State/Zip code

Give us information about your contact person for the National Environmental Achievement Track Program.

Name Coleen M. Davis

Title Environmental Control Engineer

Phone 412-233-1015

Fax 412-233-1011

E-mail cdavis@uss.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

Section A

Tell us about your facility.

1 What do you do or make at your facility?

Metallurgical coke and coal chemicals

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
3312

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☐ 100-499

☐ 500-1,000

☒ More than 1,000

Section A, continued

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

PAD004498010

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right **or** enclose a completed Checklist with your application.

See checklist

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

USS Clairton Works is the largest manufacturer of coke and coal chemicals in the United States and was the first coke plant in the world to become ISO 14001 certified.

Section B

Tell us about your EMS.

Why do we need this information?

Facilities need to have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy

☒ Yes

b. Planning

☒ Yes

c. Implementation and operation

☒ Yes

d. Checking and corrective action

☒ Yes

e. Management review

☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)?

☒ Yes

3 Did this cycle include both an EMS and a compliance audit?

☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS?

☒ Yes

If yes, what method of EMS assessment did you use?

☐ Self-assessment

☐ GEMI

☐ Other

☐ CEMP

☒ Third-party assessment

☒ ISO 14001 Certification

☐ Other

Why do we need this information?

Facilities need to show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

Section C

Tell us about your past achievements and future commitments.

1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you need to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Discharges of Toxics to Water	142.62	lb/yr	52.1	lb/yr
<p>i. How is the current level an improvement over the previous level?</p> <p>This is a more than 60 percent annual reduction in the total pounds of benzene released from the main non-contact cooling water (NCCW) outfall as a result of groundwater infiltration and process upsets and leaks.</p> <p>ii. How did you achieve this improvement?</p> <p>This was accomplished through a voluntary portion of our Early Warning Plan. As part of the plan, samples are collected every day at the mouth of Peters Creek (which runs under the plant) and USS Irvin Plant Intake (approximately 3 mile sdownstream), our main NCCW outfall (containing an average of 55 MGD), and its three branches. The reduction was the result of diligent attention and followup to the results of the daily samples through statistical process control techniques.</p>				

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
Emissions of Particulate Matter	Quantity 40.5	Units ug/m3	Quantity 39	Units ug/m3
<p>i. How is the current level an improvement over the previous level?</p> <p>The Lincoln monitor is a continuous PM-10 (particulate matter) monitor located across the Monongahela River from Clairton Works. A daily and annual averages are tracked, recorded and legally limited. The annual average is 50 ug/m3. In addition to road dust from a nearby roadway, Clairton Works is a major contributor to the PM-10 measured at this monitor. Consistent attention must be paid to daily averages to reduce the annual average particularly during adverse PM-10 weather conditions in the spring and fall.</p> <p>ii. How did you achieve this improvement?</p> <p>The reduction was accomplished through community cooperation and diligent attention to PM-10 levels continuously according to our PM-10 Self-audit Action Plan. The plan outlines three action levels. At the highest level of action - Stage 3 - the reduction of production to reduce fugitive emission potentials is considered and often implemented. Previous to the implementation of the Action Plan the area was close to being re-designated as "serious non-attainment". Currently the area has demonstrated "attainment."</p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you are a small facility, you need to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

- | | |
|--|---|
| <p>a. What is the aspect?</p> <p>b. Is this aspect identified as significant in your EMS?</p> <p>c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.</p> | <p>Discharges of Toxics to Water</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Option A:
Absolute value 45.5 lb/day
(Quantity/Units)</p> <p><input type="checkbox"/> Option B:
In terms of
units of production (Quantity/Units)
or output</p> |
|--|---|

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

- ☒ Option A:
Absolute value 30 lb/day
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

This reduction of ammonia will be accomplished through the management of upset conditions. An early warning detection system is in place using to determine toxicity in the biological system.

Second aspect you've selected

a. What is the aspect?

Discharges of Toxics to Water

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 90.7 lb/day
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

- ☒ Option A:
Absolute value 70 lb/day
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

This will be accomplished through the management of process equipment outages that raise the total cyanide in the influent to the treatment plant.

Third aspect you've selected

- | | | |
|---|---|--|
| a. What is the aspect? | Emissions of Particulate Matter | |
| b. Is this aspect identified as significant in your EMS? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output. | <input checked="" type="checkbox"/> Option A:
Absolute value | 1 day at 150 ug/m3
(Quantity/Units) |
| | <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
| d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output. | <input checked="" type="checkbox"/> Option A:
Absolute value | 0 days above 135 ug/m3
(Quantity/Units) |
| | <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
| e. How will you achieve this improvement? | This will be accomplished through the use and, if necessary, modification of our PM-10 Action Plan as described previously. | |

Fourth aspect you've selected

- | | | |
|---|---|---|
| a. What is the aspect? | Total Energy Use | |
| b. Is this aspect identified as significant in your EMS? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output. | <input checked="" type="checkbox"/> Option A:
Absolute value | 6,400,000,000 lb/yr
(Quantity/Units) |
| | <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
| d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output. | <input checked="" type="checkbox"/> Option A:
Absolute value | 6,300,000,000 lb/yr
(Quantity/Units) |
| | <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
| e. How will you achieve this improvement? | This will be accomplished by replacing cold river water with warm NCCW at the wastewater treatment plant to reduce the amount of steam required to maintain the temperature in the biological basins during cold weather. | |

Section D

Tell us about your public outreach and reporting.

Why do we need this information?

Facilities need to demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

USS Clairton Works' employees are active on several community and agency advisory boards and committees. In the ISO 14001 EnvMS there are procedures to handle concerns and communications from external sources. As necessary these are tracked.

2 How do you inform community members of important matters that affect them?

Members of the community are informed through the above mentioned boards and committees and through public meetings as appropriate.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☒ Website
www.usx.com/corp/ussteel/facilities/clairton.htm

☐ Newspaper

☐ Open Houses

☐ Other

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	Organization	Name	Phone number
Representative of a Community/ Citizen Group	1. South Allegheny School District	1. Patrick Risha	1. 412-675-3070
	2. McKeesport Women's Garden Club	2. Majorie Shriber	2. 412-673-6166
State/Local Regulator	1. EPA Region III	1. Majorie Easton	1. 304-234-0250
	2. PaDEP	2. Samuel Harper	2. 412-442-4000
	3. Allegheny County Health Department	3. Roger Westman	3. 412-578-8103
Other community/local reference	Allegheny County Emergency Management Agency	Chief Robert Full	412-473-2550

Section E

Application and Participation Statement.

On behalf of U.S. Steel Clairton Works
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Printed Name/Title Raymond R. Terza

* See attached Title V Compliance Schedules

Facility Name U.S. Steel Clairton Works

Facility Street Address 400 State Street
Clairton, PA 15025

Facility ID Numbers PAD004498010

National Environmental Achievement Track

Environmental Requirements Checklist

We've included the following Checklist to help you answer questions in Section A, Tell us about your facility. The Checklist will help you identify the major federal, state, tribal, and local environmental requirements that apply at your facility, but it is not an exhaustive list of all environmental requirements that may be applicable at your facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Air Pollution Regulations

Check All That Apply

- ☒ 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
- ☒ 2. Permits and Registration of Air Pollution Sources
- ☐ 3. General Emission Standards, Prohibitions and Restrictions
- ☐ 4. Control of Incinerators
- ☒ 5. Process Industry Emission Standards
- ☐ 6. Control of Fuel Burning Equipment
- ☒ 7. Control of VOCs
- ☐ 8. Sampling, Testing and Reporting
- ☒ 9. Visible Emissions Standards
- ☐ 10. Control of Fugitive Dust
- ☐ 11. Toxic Air Pollutants Control
- ☐ 12. Vehicle Emissions Inspections and Testing

- ☒ 13. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above
Allegheny County Article XXI

Hazardous Waste Management Regulations

Check All That Apply

- ☒ 1. Identification and Listing of Hazardous Waste (40 CFR 261)
 - ☒ - Characteristic Waste
 - ☒ - Listed Waste
- ☒ 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - ☒ - Manifesting
 - ☒ - Pre-transport requirements
 - ☒ - Record keeping/reporting
- ☐ 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - ☐ - Transfer facility requirements
 - ☐ - Manifest system and record-keeping
 - ☐ - Hazardous waste discharges
- ☐ 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - ☐ - General facility standards
 - ☐ - Preparedness and prevention
 - ☐ - Contingency plan and emergency procedures

- ☐ - Manifest system, Record keeping and reporting
- ☐ - Groundwater protection
- ☐ - Financial requirements
- ☐ - Use and management of containers
- ☐ - Tanks
- ☐ - Waste piles
- ☐ - Land treatment
- ☐ - Incinerators
- ☐ 5. Interim Standards for TSD Owners and Operators (40 CFR 265)
- ☐ 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
- ☐ 7. Administered Permit Program (Part B) (40 CFR 270)
- ☒ 8. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above
PA Hazardous Waste Regulations

Hazardous Materials Management

Check All That Apply

- ☒ 1. Control of Pollution by Oil and Other Hazardous Substances (33 CFR 153)
- ☒ 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)
- ☐ 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)
- ☒ 4. Worker Right-to-Know Regulations (29 CFR 1910.1200)
- ☒ 5. Community Right-to-Know Regulations (40 CFR 350-372)
- ☐ 6. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Solid Waste Management

Check All That Apply

- ☐ 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)
- ☐ 2. Permit Requirements for Solid Waste Disposal Facilities
- ☐ 3. Installation of Systems of Refuse Disposal
- ☒ 4. Solid Waste Storage and Removal Requirements
- ☒ 5. Disposal Requirements for Special Wastes
- ☒ 6. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above
PA Residual Waste and Tank Regulations

Water Pollution Control Requirements

Check All That Apply

- ☒ 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)
- ☒ 2. Designation of Hazardous Substances (40 CFR 116)

- ☐ 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
- ☒ 4. NPDES Permit Requirements (40 CFR 122)
- ☐ 5. Toxic Pollutant Effluent Standards (40 CFR 129)
- ☐ 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)
Name of POTW
ID # of POTW
- ☐ 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)
- ☐ 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)
- ☐ 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)
- ☒ 10. Water Quality Standards
- ☒ 11. Effluent Limitations for Direct Dischargers
- ☒ 12. Permit Monitoring/Reporting Requirements
- ☐ 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants
- ☐ 14. Collection, Handling, and Processing of Sewage Sludge
- ☐ 15. Oil Discharge Containment, Control and Cleanup
- ☐ 16. Standards Applicable to Indirect Discharges (Pretreatment)
- ☒ 17. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above
PA Clean Streams Act

Drinking Water Regulations

Check All That Apply

- ☐ 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146)
- ☐ 2. National Primary Drinking Water Standards (40 CFR 141)
- ☐ 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)
- ☐ 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources
- ☐ 5. Underground Injection Control Requirements
- ☐ 6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems
- ☐ 7. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Toxic Substances

Check All That Apply

- ☐ 1. Manufacture and Import of Chemicals, Record-keeping and Reporting Requirements (40 CFR 704)
- ☐ 2. Import and Export of Chemicals (40 CFR 707)
- ☐ 3. Chemical Substances Inventory Reporting Requirements (40 CFR 710)

- ☐ 4. Chemical Information Rules (40 CFR 712)
- ☐ 5. Health and Safety Data Reporting (40 CFR 716)
- ☐ 6. Pre-Manufacture Notifications (40 CFR 720)
- ☒ 7. PCB Distribution Use, Storage and Disposal (40 CFR 761)
- ☐ 8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)
- ☐ 9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)
- ☐ 10. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Pesticide Regulations

Check All That Apply

- ☐ 1. FIFRA Pesticide Use Classification (40 CFR 162)
- ☐ 2. Procedures Storage and Disposal of Pesticides and Containers (40 CFR 165)
- ☐ 3. Certification of Pesticide Applications (40 CFR 171)
- ☐ 4. Pesticide Licensing Requirements
- ☐ 5. Labeling of Pesticides
- ☐ 6. Pesticide Sales, Permits, Records, Application and Disposal Requirements
- ☐ 7. Disposal of Pesticide Containers
- ☐ 8. Restricted Use and Prohibited Pesticides
- ☐ 9. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Environmental Clean-Up, Restoration, Corrective Action

Check All That Apply

- ☐ 1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (Please identify)
- ☐ 2. RCRA Corrective Action
- ☐ 3. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Facility Name U.S. Steel Clairton Works
Facility Location: 400 State Street, Clairton, PA 15025
Facility ID Number(s): PAD004498010

U.S. Steel Clairton Works
Pushing / Travel Schedule of Compliance
Schedule M

Compliance Plan Element	Milestone Date
1. PEC Upgrade Submit to ACHD a permit application for Batteries 1, 2, 3, 7, 8, 9, 13, 14, and 15.	June 30, 2001
2. Wall Inspection Complete an oven-by-oven wall inspection on Batteries 1, 2, 3, 7, 8, 9, 19 and 20.	September 30, 2001
3. Wall Inspection Complete an oven-by-oven wall inspection on Batteries 13, 14, 15 and B.	March 31, 2002
4. Data Collection Complete installation and implementation of automated data collection system on Batteries 19 and 20.	May 31, 2002
5. Wall Inspection Submit to ACHD a schedule of oven wall repairs for Batteries 1, 2, 3, 7, 8, 9, 19 and 20. Revise this Schedule of Compliance as appropriate.	June 30, 2002
6. Data Collection Develop and implement program for use of information from collection system data for Batteries 19 and 20 and evaluate effectiveness.	November 30, 2002
7. PEC Upgrade Increase PEC fan capacity on Batteries 1, 2, 3, 7, 8, 9, 13, 14, & 15.	December 31, 2002 *
8. Wall Inspection Submit to ACHD a schedule of oven wall repairs for Batteries 13, 14, 15 and B. Revise this Schedule of Compliance as appropriate.	January 31, 2003
9. Data Collection Submit to ACHD a summary of the effectiveness of Items 4 and 6 and submit a schedule of installation of equipment on Batteries 1, 2, 3, 7, 8, 9, 13, 14 and 15, if appropriate. Revise the Schedule of Compliance.	March 31, 2003
10. Compliance demonstration Compliance demonstration on Batteries 19 and 20 with ACHD Article XXI, Section 2105.21.e.4 and 5. In the event continuous compliance is not achieved, the compliance plan will be revised.	June 30, 2003 **
11. Compliance demonstration Compliance demonstration on Batteries 1, 2, 3, 7, 8, 9, 13, 14, and 15 contingent upon Elements 6, 7, and 9.	December 31, 2006**

* Contingent upon receiving final installation permit within 6 months of submittal

** An interim milestone date, which is missed, is not a permit violation provided the final compliance date(s) are met

U.S. Steel Clairton Works
Underfire Stacks Schedule of Compliance
Schedule M

Compliance Plan Element	Milestone Date
1. Wall Inspection Complete an oven-by-oven wall inspection on Batteries 1, 2, 3, 7, 8, 9, 19 and 20.	September 30, 2001
2. Wall Inspection Complete an oven-by-oven wall inspection on Batteries 13, 14, 15 and B.	March 31, 2002
3. Data Collection Complete installation and implementation of automated data collection system on Batteries 19 and 20.	May 31, 2002
4. Wall Inspection Submit to ACHD a schedule of oven wall repairs for Batteries 1, 2, 3, 7, 8, 9, 19 and 20. Revise this Schedule of Compliance as appropriate.	June 30, 2002
5. Data Collection Develop and implement program for use of information from collection system data for Batteries 19 and 20 and evaluate effectiveness.	November 30, 2002
6. Wall Inspection Submit to ACHD a schedule of oven wall repairs for Batteries 13, 14, 15 and B. Revise this Schedule of Compliance as appropriate.	January 31, 2003
7. Data Collection Submit to ACHD a summary of the effectiveness of Items 3 and 5 and submit a schedule of installation of equipment on Batteries 1, 2, 3, 7, 8, 9, 13, 14, 15, and B, if appropriate. Revise the Schedule of Compliance.	March 31, 2003
8. Compliance demonstration Compliance demonstration on Batteries 19 and 20 with ACHD Article XXI, Section 2105.21.e.4 and 5. In the event continuous compliance is not achieved, the compliance plan will be revised.	June 30, 2003 **
9. Compliance demonstration Compliance demonstration on Batteries 1, 2, 3, 7, 8, 9, 13, 14, 15, and B contingent upon Elements 4, 6, and 7.	December 31, 2006 **

** An interim milestone date, which is missed, is not a permit violation provided the final compliance date(s) are met

U.S. Steel Clairton Works
Alternate Quench Tower Baffles for
Batteries 7-9, 13-15, and 19-20
Schedule of Compliance
Schedule M

Compliance Plan Element	Milestone Date
1. Preliminary Engineering Completed	May 31, 2001
2. Design Engineering Completed	August 31, 2001
3. Submit an installation permit application to ACHD	September 30, 2001
4. Begin Construction	March 31, 2002 *
5. Complete Construction	March 31, 2003 *

* Contingent upon receiving permit within 6 months of submittal

U.S. Steel Clairton Works
Tar Decanter Pitch Traps
Schedule of Compliance
Schedule M

Compliance Plan Element	Milestone Date
1. Preliminary Application Engineering and choose trial solution.	September 30, 2001
2. Evaluate solution and revise schedule of compliance as appropriate.	March 31, 2002
3. Compliance demonstration – Dependent on solution	June 30, 2003

U.S. Steel Clairton Works
Tar Tank Overflow Sample/ View Boxes
Schedule of Compliance
Schedule M

Compliance Plan Element	Milestone Date
1. Design Engineering	March 31, 2001
2. Complete Construction	December 31, 2001
3. Compliance Demonstration	January 31, 2002

U.S. Steel Clairton Works
Light Oil Loading Dock
Schedule of Compliance
Schedule M

Compliance Plan Element	Milestone Date
1. Conduct Leak Test	July 31, 2001
2. Revise Operation and Maintenance Plan	August 31, 2001
3. Compliance Demonstration	September 30, 2001

U.S. Steel Clairton Works
Ammonia Flare
Schedule of Compliance
Schedule M

Compliance Plan Element	Milestone Date
1. Submit permit revision application	Complete
2. Compliance Demonstration	September 30, 2001 *

* Contingent upon receiving a permit within 6 months of submittal

U.S. Steel Clairton Works
Boiler Cold Starts
For Boilers 1,2, T1, T2, R1, and R2
Schedule of Compliance
Schedule M

Compliance Plan Element	Milestone Date
1. Submit waiver request	February 15, 2001
2. Receive waiver from ACHD	Dependant upon ACHD approval of request
3. Submit initial report for compliance	6 months after receipt of ACHD approval of request

U.S. Steel Clairton Works
Biennial Testing
For Boilers T1, T2, R1, and R2
Schedule of Compliance
Schedule M

Compliance Plan Element	Milestone Date
1. Submit test protocol for biennial testing for Boilers T1, T2, R1, and R2	July 31, 2002
2. Conduct biennial testing for Boilers T1, T2, R1, and R2	December 31, 2002
3. Submit test report to ACHD for Boilers T1, T2, R1, and R2	April 30, 2003

U.S. Steel Clairton Works
Battery Door 40 % Opacity
Schedule of Compliance
Schedule M

Compliance Plan Element	Milestone Date
1. Conduct compliance evaluation and investigation	May 31, 2001
2. Revise compliance plan	August 31, 2001

U.S. Steel Clairton Works
No. 2 Continuous Unloader NSPS
Schedule of Compliance
Schedule M

Compliance Plan Element	Milestone Date
1. Compliance test	May 31, 2001
2. Notification	June 30, 2001

U.S. Steel Clairton Works
Battery NESHAP
Startup, Shutdown, and Malfunction Plan
Schedule of Compliance
Schedule M

Compliance Plan Element	Milestone Date
1. Review Existing SOP's for conformance with Part 63 Requirements	May 31, 2001
2. Revise compliance plan to withdraw or provide schedule	June 30, 2001

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK (7875) or e-mail ptrack@indecon.com. Mail completed applications to:

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